Morgan Lewis

John P. Lavelle, Jr.
Partner
+1.609.919.6688
john.lavelle@morganlewis.com

March 24, 2017

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building and U.S. Courthouse
50 Walnut Street, Courtroom MLK5D
Newark, New Jersey 07101

Re: Norma Oliver, et al. v. Funai Corporation, Inc., et al.
Case No. 2:14-cv-04532 (JLL)(JAD)

Dear Magistrate Judge Dickson:

We represent Funai Corporation, Inc. ("Funai") in the above-referenced matter. We write to provide the Court with an update regarding the status of the Parties' continued settlement negotiations and to request an additional week, through and including Friday, March 31, 2017, for the Parties to complete their settlement negotiations.

As Your Honor is aware, on March 13, 2017, the Parties informed the Court that although we had been unable to reach a settlement during our recent private mediation, the Parties intended to (and did so) continue our settlement discussions. The Court allowed the Parties until March 17, 2017 to submit a further status report (Dkt. 129), which the Court subsequently agreed to extend until March 24, 2017. (Dkt. 131). During this time, the Parties have continued to make progress in their settlement discussions and we respectfully request an additional week to continue these discussions and to submit a further status report. If these continued efforts are unsuccessful, the Parties agree to propose an amended schedule for the remaining case deadlines at that time.

Counsel for Funai has conferred with counsel for Plaintiffs, and Plaintiffs join in this request for relief stated herein.

We thank Your Honor for his kind consideration of our request.

Respectfully submitted,

/s/ John P. Lavelle, Jr.

John P. Lavelle, Jr.

cc: All Counsel of Record (via ECF)